

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

UNITED STATES OF AMERICA

v.

07 CR. 557 (JGK)

WILFREDO SALAS,

NOTICE OF MOTION

Defendant.

-----X

PLEASE TAKE NOTICE, that defendant WILFREDO SALAS, by his attorney, Avrom Robin, and upon the annexed affirmation and all papers and proceedings in this case, moves this Court, before the Honorable John G. Koeltl, United States District Court Judge, at the United States Courthouse, located at 500 Pearl Street, New York, New York for an Order:

1. Suppressing all electronic surveillance evidence and the fruits thereof, pursuant to Fed. Rules of Crim. P. 12(b)(3)(C), on the grounds that they were recorded in violation of federal law and the Fourth Amendment to the United States Constitution;
2. Suppressing any and all evidence recovered from the residence at 9509 Jamaica Avenue, Apartment 1R, Woodhaven, New York and the containers and closed items;
3. Suppressing any and all evidence of statements attributable to defendant allegedly made during and/or subsequent to his encounter with the police on June 4, 2007;
4. Granting a Bill of Particulars, pursuant to Federal R. Crim. P. 7(f);
4. Granting WILFREDO SALAS such other, further and different relief as this Court may deem just, equitable and proper.

Dated: May 23, 2008
New York, New York

Respectfully submitted,

/s/ filed via ECF

AVROM ROBIN
Law Offices of Ira D. London
Attorney for the Defendant
Wilfredo Salas
245 Fifth Avenue, Suite 1900
New York, New York 10016
(212) 683-8000

To: United States Attorney
Southern District of New York
One St. Andrew's Plaza
New York, New York 10007
ATTN: DAVID B. MASSEY, A.U.S.A.

Clerk of the Court
United States District Court
Southern District of New York